Claims 22-24 and 29-36 are pending in this application.

Claims 22-24 and 36 are amended.

Claims 37-39 are newly added.

1. Claims 22-24 and 36 were rejected under 35 USC 112 as failing to comply with the

written description requirement. Applicant's claim amendments delete the objected to language.

In particular, Applicant's amended claims describe that the centralized feature is dissociated

from the call after call service is performed by the centralized feature. Support for the claim

amendments is provided in Applicant's original specification, for example, at p. 2, lines 13-16, p.

5, lines 12-14 and lines 21-24, p. 6, lines 5-9, p. 6, lines 23-24 and lines 28-31.

Claims 22-24 and 29-36 were rejected under 35 USC 103(a) as unpatentable over Hakim.

in view of Gossett et al.

Hakim teaches an Internet voice call originated through an Internet Telephony Server

(ITS). The ITS receives the call over the PSTN and routes the call to a destination ITS (e.g.,

Hakim at col. 4, lines 49-55) for the terminating destination. Hakim teaches an enhancement to

provide the ability of the caller to dial a destination telephone number that is a toll-free service or

other similar type of number for making the call. The call to the originating ITS is then routed to

the destination ITS, and the destination ITS dials over the PSTN to connect the call to the

destination number. Thus, the originating ITS and terminating ITS control the route and and

enable the connection on the PSTN for the destination number

Hakim's originating and terminating ITS's are a "gatekeeper." The gatekeeper

permits/disallows the call via toll-free service to reach the destination number on the PSTN.

Hakim's ITS's do not provide any call service or feature for the call, itself. Rather, the ITS's

merely connect the call to destination, by routing over the packet network and calling the PSTN

destination number at the terminating ITS. The ITS's do not perform any distinct call service for

the call once the call is permitted for the toll-free service, and do not direct the call to a feature

platform for such a call service for the call.

Gossett teaches a routing engine of the packet network. The routing engine

communicates with the unique originating gateway of the call, and selects available destination

gateways based on designated preferences defined by that unique originating gateway (e.g., cost

and quality requirements for the call, as designated by the unique originating gateway) (Gossett

at col. 5, lines 14-19). The Gossett routing engine, therefore, bases routing of the call on the

particular unique originating gateway for the call. The unique originating gateway dictates what

the routing engine chooses for the route. Each distinct originating gateway of the network can

have respective designated preferences that dictate how the routing engine routes and connects a

call through that distinct originating gateway onto the PSTN. Gossett's routing engine is

dependent on preferences of the unique originating gateway for each respective call, and does

not provide any call service for the call. Moreover, Gossett can not provide call services via

centralized feature platform, such that the call services are available to multiple calls each

originating from different originating gateways.

Both Hakim and Gossett teach an originating gateway that provides "edge centralization"

function for the call on the network. Hakim's originating gateway determines whether the call

should be permitted over the toll-free service and, if so, enables the terminating gateway

connection to destination on the PSTN. Gossett's originating gateway dictates what destination

gateway(s) to which the routing engine routes the call. As described in Applicant's specification

in the background, the Hakim and Gossett edge centralization on the network requires that each

separate "edge" gateway must provide any functionality that applies for the call.

Applicant's amended claims describe that a call service for the call is provided by a

centralized feature platform. Because the feature platform provides centralized operations in the

manner described in Applicant's amended claims, the same call service is available to multiple

calls each originated from different gateways. Centralization of the operation of the call service

avoids the "edge" complexity (i.e., of each gateway for calls having necessary support to provide

various feature services) that is required for operations as taught and suggested by Hakim and

Gosset.

Applicant's newly added claims 37-39 point out that multiple calls from different

gateways are directed to the centralized feature and that different call service can be performed

as to the respective calls.

Appl. No. 09/721,220 Amdt. dated December 3, 2008 Reply to Office Action of September 3, 2008

Applicant respectfully requests withdrawal of the objection and rejection and allowance

of all pending claims.

In view of the foregoing, Applicant respectfully requests reconsideration and allowance

of all pending claims 22-24 and 29-36, and issuance of a timely Notice of Allowance in this case.

If the Examiner has any questions or comments, the undersigned attorney for Applicant

respectfully requests a call to discuss any issues. The Office is authorized to charge any excess

fees or to credit any overage to the undersigned's Deposit Account No. 50-1350.

Respectfully submitted,

Date: December 3, 2008

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